

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address  Derrick Talerico (SBN 223763) David B. Zolkin (SBN 155410) WEINTRAUB ZOLKIN TALERICO & SELTH LLP 11766 Wilshire Blvd., Suite 730 Los Angeles, CA 90025 Telephone: 424-500-8552 Email: dtalerico@wztslaw.com dzolkin@wztslaw.com	FOR COURT USE ONLY
<input type="checkbox"/> <i>Individual appearing without attorney</i> <input checked="" type="checkbox"/> <i>Attorney for: Broadway Avenue Investments, LLC</i>	
<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b>	
In re:  SEATON INVESTMENTS, LLC, et al.,	CASE NO.: 2:24-bk-12079-VZ (Jointly Administered) CHAPTER: 11
<p><input type="checkbox"/> Affects all Debtors. <input checked="" type="checkbox"/> Affects Seaton Investments, LLC (2:24-bk-12079-VZ) <input type="checkbox"/> Affects Colyton Investments, LLC (2:24-bk-12080-VZ) <input type="checkbox"/> Affects Broadway Avenue Investments, LLC (2:24-bk-12081-VZ) <input type="checkbox"/> Affects SLA Investments, LLC (2:24-bk-12082-VZ) <input type="checkbox"/> Affects Negev Investments, LLC (2:24-bk-12091-VZ) <input type="checkbox"/> Affects Alan Gomperts (2:24-bk-12074-VZ) <input type="checkbox"/> Affects Daniel Halevy (2:24-bk-12075-VZ) <input type="checkbox"/> Affects Susan Halevy (2:24-bk-12076-VZ)</p> <p style="text-align: right;">Debtor(s).</p>	<p><b>NOTICE OF MOTION FOR:</b> ORDER AUTHORIZING DEBTOR TO ENTER INTO POST-PETITION LEASE</p> <p><b>(Specify name of Motion)</b></p> <p>DATE: December 12, 2024 TIME: 11:00 a.m. COURTROOM: 1368 PLACE: 255 East Temple Street Los Angeles, CA 90012</p>

1. TO (specify name): The Honorable Vincent P. Zurzolo, United States Bankruptcy Judge, and all Parties in Interest:
2. NOTICE IS HEREBY GIVEN that on the following date and time and in the indicated courtroom, Movant in the above-captioned matter will move this court for an Order granting the relief sought as set forth in the Motion and accompanying supporting documents served and filed herewith. Said Motion is based upon the grounds set forth in the attached Motion and accompanying documents.
3. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.)

4. **Deadline for Opposition Papers:** This Motion is being heard on regular notice pursuant to LBR 9013-1. If you wish to oppose this Motion, you must file a written response with the court and serve a copy of it upon the Movant or Movant's attorney at the address set forth above no less than fourteen (14) days prior to the above hearing date. If you fail to file a written response to this Motion within such time period, the court may treat such failure as a waiver of your right to oppose the Motion and may grant the requested relief.
5. **Hearing Date Obtained Pursuant to Judge's Self-Calendar Procedure:** The undersigned hereby verifies that the above hearing date and time were available for this type of Motion according to the judge's self-calendaring procedures.

Date: 11/21/2024

WEINTRAUB ZOLKIN TALERICO & SELTH LLP

Printed name of law firm

/s/ Derrick Talerico

Signature

Derrick Talerico

Printed name of attorney

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

11766 Wilshire Blvd., Suite 730, Los Angeles, CA 90025

A true and correct copy of the foregoing document entitled: **NOTICE OF MOTION FOR (specify name of motion)**  
**ORDER AUTHORIZING DEBTOR TO ENTER INTO POST-PETITION LEASE**

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 11/21/2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

See attached NEF Service List

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (date) 11/21/2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

See attached US Mail Service List

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 11/21/2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Vincent Zurzolo (via Priority Mail)  
United States Bankruptcy Court  
255 East Temple St., Suite 1360  
Los Angeles, CA 90012

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

11/21/2024

Martha E. Araki

Date

Printed Name

/s/ Martha E. Araki

Signature

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

Seaton Investments, LLC – Jointly Administered

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

- Attorneys for Corporate Debtors Seaton Investment, LLC, Colyton Investments, LLC, Broadway Avenue Investments, LLC, Negev Investments, LLC, SLA Investments, LCC: **Derrick Talerico:** dtalerico@wztslaw.com; maraki@wztslaw.com; sfritz@wztslaw.com; admin@wztslaw.com
- Attorneys for Individual Debtors Alan Gomperts, Daniel Halevy, Susan Haley: **Zev Shechtman, Carol Chow, Turner Falk, Ryan Coy:** zev.shechtman@saul.com; zshechtman@ecf.inforuptcy.com; carol.chow@saul.com; easter.santamaria@saul.com; turner.falk@saul.com; ryan.coy@saul.com
- Attorneys for Creditor First Foundation Bank: **Scott R Albrecht:** scott.albrecht@sgsattorneys.com; jackie.nguyen@sgsattorneys.com
- Attorneys for Creditor Korth Direct Mortgage, Inc.: **Tanya Behnam:** tbehnam@polsinelli.com, tanyabehnam@gmail.com; ccripe@polsinelli.com; ladocketing@polsinelli.com
- Attorneys for Creditor Los Angeles County Treasurer and Tax Collector: **Jacquelyn H Choi:** jacquelyn.choi@rimonlaw.com; docketingsupport@rimonlaw.com
- Attorneys for Creditor United States of America on behalf of the Internal Revenue Service: **Robert F Conte:** robert.conte@usdoj.gov; caseview.ecf@usdoj.gov; usacac.tax@usdoj.gov
- Courtesy NEF/Interested Party: **Christopher Cramer:** secured@becket-lee.com
- Attorneys for Creditor Archway Real Estate Income Fund I SPE I, LLC: **Michael G. Fletcher, Bruce D. Poltrack, Paige Selina Poupart, Gerrick Warrington:** mfletcher@frandzel.com; ppoupart@frandzel.com; gwarrington@frandzel.com; bpoltrock@frandzel.com; sking@frandzel.com; achase@frandzel.com
- Attorneys for Creditor Wells Fargo National Bank West: **Todd S Garan:** ch11ecf@aldridgeppte.com; TSG@ecf.inforuptcy.com; tgaran@aldridgeppte.com
- Attorneys for Creditor Los Angeles County Treasurer and Tax Collector: **Richard Girgado:** rgirgado@counsel.lacounty.gov
- Attorneys for Creditor Harvest Small Business Finance, LLC: **Jacqueline L James:** jjames@hrhllaw.com
- Courtesy NEF/Interested Party Avi Muhtar: **Avi Edward Muhtar:** amuhtar@eaccidents.com
- Attorneys for Creditor Wells Fargo Bank, N.A.: **Jennifer C Wong:** bknotice@mccartyholthus.com; jwong@ecf.courtdrive.com
- US Trustee's Office: ustpregion16.la.ecf@usdoj.gov; **Kelly L. Morrison:** Kelly.l.morrison@usdoj.gov

Label Matrix for local noticing  
0973-2  
Case 2:24-bk-12079-VZ  
Central District of California  
Los Angeles

~~Archway Broadway Loan SPE, LLC, fka Archway~~  
~~Frandzel Robins Bloom & Csato, L.C.~~  
~~c/o Michael Gerard Fletcher~~  
~~1000 Wilshire Blvd., 19th Fl.~~  
~~Los Angeles, Ca 90017-2457~~ NEF PARTY

~~Archway real estate income fund~~  
~~c/o Frandzel Robins Bloom & Csato, L.C.~~  
~~1000 Wilshire Boulevard, 19th Floor~~  
~~Los Angeles, CA 90017-2457~~  
NEF PARTY

~~First Foundation Bank~~  
~~c/o Scott R. Albrecht, Esq.~~  
~~19800 MacArthur Blvd., Suite 1000~~  
~~Suite 1000~~  
~~Irvine, CA 92612-2433~~ NEF PARTY

~~Harvest Small Business Finance, LLC~~  
~~Hemar, Rousso & Weald, LLP~~  
~~c/o Jacqueline L. James~~  
~~15910 Ventura Blvd., 12th Floor~~  
~~Encino, CA 91336-2829~~ NEF PARTY

~~Korth Direct Mortgage Inc.~~  
~~c/o Polsinelli LLP~~  
~~2049 Century Park East~~  
~~Suite 2900~~  
~~Los Angeles, CA 90067-3221~~ NEF PARTY

(p) LOS ANGELES COUNTY TREASURER AND TAX COLLE  
ATTN BANKRUPTCY UNIT  
PO BOX 54110  
LOS ANGELES CA 90054-0110

Seaton Investments, LLC  
264 S Oakhurst Dr  
Beverly Hills, CA 90212-3504

~~United States of America on behalf of Intern~~  
~~Attn: Robert F. Conte~~  
~~300 N. Los Angeles Street, Room 7211~~  
~~Los Angeles, CA 90012-3342~~  
NEF PARTY

~~Wells Fargo Bank, N.A.~~  
~~c/o McCarthy & Holthus, LLP~~  
~~2763 Camino Del Rio South, Suite 100~~  
~~San Diego, CA 92108-3708~~  
NEF PARTY

~~Los Angeles Division~~  
~~255 East Temple Street,~~  
~~Los Angeles, CA 90012-3332~~

AIRE Ancient Baths Los Angeles LLC  
88 Franklin St  
New York, NY 10013-4085

Alan D Gomperts  
264 S Oakhurst Dr  
Beverly Hills, CA 90212-3504

Alta Fire Pro  
PO Box 7007  
Mission Hills, CA 91346-7007

(p) BALBOA CAPITAL CORPORATION  
575 ANTON BOULEVARD  
12H FLOOR  
COSTA MESA CA 92626-7169

CA Dept of Tax and Fee Admin  
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Sacramento, CA 94279-0029

California Refrigeration & Supply  
1926 Glendon Ave Apt 4  
Los Angeles, CA 90025-4661

Colyton Investments LLC  
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Los Angeles, CA 90013-2210

Daniel Halevy  
257 S Linden Dr  
Beverly Hills, CA 90212-3704

Daniel Halevy  
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Los Angeles, CA 90035

Deborah Feldman Esq  
12466 Marsh Pointe Rd  
Sarasota, FL 34238-2115

Deborah Feldman Esq  
24611 Mulholland Hwy  
Calabasas, CA 91302-2325

Franchise Tax Board  
Bankruptcy Section MS A-340  
PO Box 2952  
Sacramento, CA 95812-2952

Gomperts and Halevy Family Trust  
264 S Oakhurst Dr  
Beverly Hills, CA 90212-3504

Halevy Family Trust  
Dated September 6 2010  
257 S Linden Dr  
Beverly Hills, CA 90212-3704

~~Harvest Small Business Finance, LLC~~  
~~c/o Jacqueline L. James~~  
~~Hemar, Rousso & James, LLC~~  
~~15910 Ventura Blvd., 12th Flr~~  
~~Encino, CA 91336-2829~~ NEF PARTY

Internal Revenue Service  
PO Box 7346  
Philadelphia, PA 19101-7346

Korth Direct Mortgage Inc  
135 San Lorenzo Ave Ste 600  
Miami, FL 33146-1875

Korth Direct Mortgage Inc.  
Attn: Keith E. Henrich  
135 San Lorenzo Avenue, Suite 600  
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Mark Berkowitz CPA  
5850 Canoga Ave Ste 220  
Woodland Hills, CA 91367-6505

~~Pelsinelli LLP~~  
~~Attn: Garrick Vanderin Esq.~~  
~~2049 Century Park E Ste 2900~~  
~~Los Angeles, CA 90067-3221~~  
NEF PARTY

RG Fire Inc  
8721 Laurel Canyon Blvd  
Sun Valley, CA 91352-2919

Sean Rudes and Monfrere  
3891 Beverly Blvd #328  
Los Angeles, CA 90004

Simply Electrical  
14101 S Budlong Ave  
Gardena, CA 90247-2231

SoCalGas  
P.O. Box 30337  
Los Angeles CA 90030-0337

~~Sue Halevy~~  
~~257 S Linden Dr~~  
~~Beverly Hills, CA 90212-3704~~  
DUPLICATE

~~United States Trustee (LA)~~  
~~915 Wilshire Blvd, Suite 1850~~  
~~Los Angeles, CA 90017-3560~~  
NEF PARTY

Urban Lime  
915 Mateo St Ste 301  
Los Angeles, CA 90021-1784

WGW Sales Inc  
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Winnipeg, MB R3A 054  
CANADA

Wells Fargo Bank, N.A.  
Attn: Bankruptcy Department  
MAC N9286-01Y  
Default Document Processing  
P.O. Box 1629  
Minneapolis, MN 55440-1629

Alan Gomperts  
264 South Oakhurst Drive  
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~~Avi Muhtar~~  
~~Crown & Stone Law, P.C.~~  
~~407 N. Maple Drive~~  
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~~Derrick Talerico~~  
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FILING ATTNY

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